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January 11, 1993

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Mr. Darron Haddock Utah Department of Natural Resources Division of Oil, Gas and Mining 3 Triad Center, Suite 350 Salt Lake City, Utah 84180-1203 DIVISION OF



EarthFax
Engineering Inc.
Engineers/Scientists
7324 So. Union Park Ave.
Suite 100
Midvale, Utah 84047
Telephone 801-561-1555

SUBJECT: Crandall Canyon Mine Steam Buffer Zone - Blind Canyon

Dear Darron:

Please find the enclosed information regarding surface flow of the unnamed drainage in Blind Canyon, a Canyon in State Lease ML-21569 (T15S-R6E-Sec36). Genwal Coal Company presently holds the coal lease and a mining permit to mine coal in the above referenced lease. The State of Utah owns the surface, water, and mineral rights in Lease ML-21569. As per your January 7, 1993 telephone conversation with Jay Marshall of Genwal Coal Co., in order to facilitate regulatory review, the information contained herein is submitted as a revision of the May 15, 1992 update of Chapter 14 of the Crandall Canyon Mining and Reclamation Plan.

In the original (1991) mining permit application for Lease ML-21569 (M&RP Chapter 14), as well as the most recent update (May 15, 1992), Genwal committed to monitor surface flow in Blind Canyon to enable determination of what reaches contain perennial flow, and hence where a stream buffer zone beneath Blind Canyon was needed. Genwal committed to collect this data prior to commencement of retreat mining operations in the area of Blind Canyon.

Data collected in 1992 enable delineation of the stream buffer zone beneath Blind Canyon. The definition of a "perennial stream" used to determine where a stream buffer zone is required, is that which appears in the April 12, 1990 and September 11, 1992 DOGM Coal Mining Rules.

In order to allow mining to proceed, Genwal respectfully requests that the information contained herein be reviewed as expeditiously as possible, as Genwal will be at the stage of retreat mining the area beneath Blind Canyon during the first quarter of 1993.

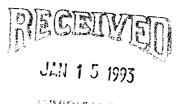
Genwal Coal Company commits to making the changes contained herein to the 5-year permit renewal, which has recently been delivered to the Division's offices. In accordance with DOGM guidelines, the revision date for each page updated appears in the lower right corner.

To facilitate DOGM's review, below is an outline of the permit modifications contained herein which reflect the newly acquired hydrologic data.

If you have any questions or comments please do not hesitate to phone EarthFax Engineering (561-1555) or Genwal Coal (687-9813). I will be happy to meet with DOGM personnel at your offices in Salt Lake City if doing so will expedite review.

Sincerely,

Brent K. Bovee Hydrogeologist



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PAGE	PERMIT MODIFICATION
14-v	Appendices 14-20, 14-21, and 14-22 are added to the LIST OF APPENDICES, to indicate the presence of additional appendices.
14-3	To correctly state ownership of the surface, water, and mineral rights of the State Leases ML-21568 and ML-21569, the listing of the USFS as an owner was removed.
14-32	The position of commencement of intermittent flow in Blind Canyon was updated. Data collected in 1992 indicate intermittent flow in Blind Canyon exists from the top of the Canyon to its confluence with Huntington Canyon.
14-33	The USFS was removed as one of the surface owners to accurately indicate ownership.
14-36	The first two paragraphs of Section 14.5.2.5 were combined into one paragraph. Appendices 14-20 and 14-21 are listed as those containing Blind Canyon surface hydrologic data. A statement is made that these two appendices indicate that Blind Canyon exhibits ephemeral and intermittent flow from the top of the canyon to its confluence with Huntington Canyon.
14-41	Page 14-42 is changed to number 14-41. It is stated that Appendix 14-22 contains an overburden study. The overburden study indicates that the presence of clays, physical closure of tension fractures, and the mineralogy of the overburden will serve to seal fractures that may develop from retreat mining. Given the sealing nature of the overburden, and the thick nature of the overburden, it is stated that seeps and springs should not be affected by subsidence fractures.
14-42	Page 14-41 is changed to number 14-42. The maximum limit of subsidence along the eastern edge of Lease ML-21569 is modified to reflect the removal of the barrier pillar beneath Blind Canyon.
14-43	As a result of repagination, the paragraph that was at the bottom of the former page 14-42, now appears at the top of page 14-43.
Appendix 14-20	Addition
Appendix 14-21	Addition
Appendix 14-22	Addition
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